Our Case Number: ABP-312131-21



Terri Gray & Paul Burke 19 Clonshaugh Heights Clonshaugh Dublin 17

Date: 11 June 2024

Re: Greater Dublin Drainage Project consisting of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility Townlands of Clonshagh, Dubber and Newtown, County Fingal and Dublin City

Dear Sir / Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Milida, ck 11.0

Aisling Reilly Executive Officer Direct Line: 01-8737131

PA09

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Aisling Reilly

From: Sent: To: Subject: LAPS Friday 7 June 2024 13:30 Aisling Reilly FW: Case No: ABP-312131-21 - Greater Dublin Drainge Project

From: Terri Gray <terrigray30@gmail.com> Sent: Thursday, June 6, 2024 10:17 PM To: LAPS <laps@pleanala.ie> Subject: Case No: ABP-312131-21 - Greater Dublin Drainge Project

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

F. A.O. Aisling O'Reilly

On the 7^{th of} March we received a letter from you regarding the Greater Dublin Drainage Project case no: AABP-312131-21. As an interested party and somebody who had previously submitted an observation regarding this plant, I was pleased to note that additional information had been provided to An Bord Pleanála regarding the environmental impact and that Uisce Eireann has been instructed to carry out further public consultation.

Issue 1 - Consulation process

However, I find the public consultation is flawed and not in compliance with Section 37F of your own regulations:

Section 37F(2) the legal responsibility is on ABP to advise of period and availability of the new documents NOT UI or by advising the applicant to do it. The action of notice, is prescribed by law to be carried out by ABP (see emphasis on bold below). UI may not have a comprehensive list of all people who made submissions who must be notified that they have a right of reply, many of whom were unaware of this additional consultation happening now(I have spoken to a few). They were waiting for another letter from ABP subsequent to the March letter. A single advertisement by the applicant does not fulfill the Boards statutory obligation to give notice.

(2) Where an applicant submits a revised F394[environmental impact assessment report] to the Board in accordance with subsection (1)(a) or otherwise submits further information or revised particulars, plans or drawings in accordance with subsection (1), which, in the opinion of the Board, contain significant additional information on the effect of the proposed development on the environment to that already submitted, **the Board shall**—

(a) make the information, particulars, plans or drawings, as appropriate, available for

inspection,

(b) give notice that the information, particulars, plans or drawings are so available, and

(c) invite further submissions or observations to be made to it within such period as it may specify.

I did not see the notice published in the newspaper and found out only recently. I went onto the GDD website and tried to navigate the additional information and found it extremely difficult. This is not in line with keeping interested parties informed and up to date on any new information.

Your letter states that "specified additional information provided from the applicant" warranted that the case be re-opened to public consultation, yet there has been little transparency and regard to your own regulation. The only published notice was by the applicant, no new signage, information meetings or media coverage was available to anyone.

It should also be noted that since the consultation began and even up to the Oral Hearing the new houses in Belcamp Manor were not built, so those residents have not been provided with any information events or media coverage. Most residents are not aware that they will be living within one kilometre of the boundary wall to the proposed plant.

In 2018 a large number of residents in Clonshaugh and surrounding areas raised significant concerns about this plant, the scale of the plant, close proximity to houses, schools, parks and public amenities, but An Bord Pleanála have shown little respect or responsibility for those living so close to this proposed plant and not followed the own regulation regarding public consultation.

Issue 2 - Outer Public Safety Zone for Dublin Airpor

In August 2022 the new flight path became operational in Dublin Airport and this proposed plant will be directly under the new flight path and within the Outer Public Safety Zone for Dublin Airport, yet this has not been considered. At the oral hearing we were advised that Biogas will be stored on site in Clonshaugh and in addition Chemicals will be used to treat the wastewater. Surely this calls into question the location as this may puts airline staff and passengers at risk.

I hope that the IAA have been fully informed, and all safety measures are adhered to.

I look forward to hearing back from LAP as a matter of urgency and would like to know if the public consultation will be expanded to include all interested parties and all information freely and easily accessible.

Kind Regards

Terri Gray & Paul Burke

19 Clonshaugh Heights

Dublin 17